

This comment is provided by the undersigned on behalf of Vidalia Communications Corporation in the matter before the FCC MB Docket #04-232, Notice of Rulemaking on Retention by Broadcasters of Program Recordings.

We share the Commission's concerns about the acts of some irresponsible broadcasters whose high profile infractions are not acceptable in a civil society. The Commission should continue to deal with these corporations and their employees who debase our industry and insult our listeners. Not only should they be fined, their licenses should be revoked.

Equally, we strongly and respectfully recommend the Commission not impose costly and impractical recording requirements on the thousands of U.S. broadcasters operating in small markets who have never, and would never, insult our listeners with intentionally indecent remarks or programming. Not only are they our listeners, they are our customers, friends and neighbors. We see them at church, at civic clubs, at community events, at high school ballgames. To offend them would be ethical and economic suicide. We deal in service, not shock value.

Our three radio stations have been named Georgia Association of Broadcaster's Station of the Year in four of the past six years. Additionally we have won awards for community service, local news coverage, local sports coverage, and documentary production. We have accomplished this with a dedicated staff of eight fulltime and three parttime employees. Requiring responsible broadcasters to invest more money, time and people in a burdensome FCC-mandated recording system is unfair and uncalled for. It is hard to imagine the percentage of infractions nationwide is sufficient to justify such a regulatory overreaction.

I fear the FCC is completely out of touch with the realities of small market broadcasting. The loss of jobs in small markets coupled with the dominance of "big box stores" has seriously eroded small businesses which are the backbone of local radio advertising sales. We appear to have reached a sales plateau which seriously limits our potential. Accordingly, additional FCC requirements serve only to further degrade our capabilities and hinder our ability to serve our communities. We have done nothing wrong and should not be penalized.

Respectfully,
Zack Fowler, GM
Vidalia Communications Corp